

# **EXHIBIT 7**

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CERTAIN DOMAINS

Case No.: 24-mj-1395

**DECLARATION OF VLADIMIR TABAK**

I, VLADIMIR TABAK, declare as follows:

1. I am the Director of ANO Dialog, Petitioner in the above captioned action, and I am familiar with the facts and circumstances set forth herein. This declaration is based on my personal knowledge and understanding.

2. This declaration is submitted in support of Petitioners' (ANO Dialog and Timofey V's) application to direct the United States Government to return one specific domain name "waronfakes.com" back to them, as the rightful owners and operators thereof, and to cease any measures to redirect the domain names to substitute servers at the direction of the Federal Bureau of Investigation ("FBI").

3. I am Timofey's employer and bear full responsibility for his work and efforts in relation to the domain name known as waronfakes.com.

4. Since the affidavit prepared by the unknown FBI agent mentions ANO Dialog, Timofey and myself, I feel it is my duty as the responsible director of Dialog to make this affidavit to clarify and correct inaccuracies and mistakes made by the unknown FBI.

5. Petitioners Timofey V and Dialog, and myself, have nothing to do with "*Project Doppelganger*," money laundering or trademark infringement cited as a basis to seize the subject waronfakes.com domain. We vehemently deny any violations of U.S. laws. Dialog provides

services that are predominantly developed and offered for the Russian public; Dialog's activity is focused in, based in and directed to the Russian people predominantly. Whether by mistake or conjecture, including Dialog in allegations dealing with activities to cause election interference is baseless and utterly lacking in any factual basis.

6. Dialog (<https://dialog.info>), established in 2019, is an "autonomous noncommercial organization," which is a non-membership organization undertaking services in the field of education, social policy, culture, and similar fields. *See* Russian Civil Code Article 123.24. This interdepartmental competence centre, founded by the Moscow City Government, specializes in Internet communications and acts as a digital dialogue operator between the government and Russian society. *See* True and correct copy of the ByLaws annexed as **Exhibit A** hereto.

7. By way of background, an Autonomous Non-Profit Organization (ANO) in Russia is a legal entity established to provide services in various sectors such as education, health care, culture, science, law, sports, and other areas.

8. The purpose of the Dialog is to provide public relations and communications services in Russia, including:

- development digital projects в sphere public digital projects in the field of public relations and communications;
- Public Opinion Research;
- formation of an effective system of communications in the information and telecommunication network of the Internet.

9. In large part, Dialog has been tasked with handling citizen complaints to the Russian government public officials, analytics, developing digital skills for public employees,

disseminating socially significant information, and ensuring a safe digital environment for Russian citizens. The key areas of activity have been:

**Combating False Information:**

- Develops systems to counter fake information, including the Noodle Media project, an aggregator for verifying information and educating on digital literacy.
- Refuted 6,500 fakes and processed over 205,000 messages through public chatbots, engaging 2.04 million users on social networks.

**Educational Activities:**

- Created the Dialogue PRO platform with 190,000 registered users, offering educational content on media and digital literacy.
- Conducts over 8,000 annual training events, collaborates with universities on 80+ programs, and has trained 230,000 information security professionals.
- Holds an educational license to run its own programs and issue official documents.
- Dialog's comprehensive efforts aim to enhance communication between the government and citizens, support informed decision-making, and improve digital literacy and information security across Russia.

10. In my understanding, there are many nonprofit organizations in the United States that also engage in public opinion research, telecommunications and digital project, including the following, by way of example only:

- <https://connectednation.org/about> : work at the community, state, and federal levels and with both public and private to expand access, adoption, and use of broadband;

- <https://www.pewresearch.org/about/> - informs the public about the issues, attitudes and trends shaping the world; conducts public opinion polling, demographic research, content analysis and other data-driven social science research. Mission includes enriching the public dialogue and support sound decision-making.
- Code for America (CfA): modernizing government services through technology.

11. Such organizations and platforms share similar goals with Dialog by leveraging technology to enhance government-citizen interactions, streamline public services, and ensure efficient communication and service delivery. In the United States, clearly there are also many local government websites and complaint management tools for government, including analytics and reporting. Dialogue has served such functions in Russia.

12. Dialog has nothing to do with United States, "*Project Doppelganger*," money laundering or trademark infringement. The waronfakes.com is just one of the many projects that it has supported, none of which have anything to do with U.S. elections.

13. Dialog was never involved in any activity related to the U.S. elections. To my knowledge, there was nothing on the waronfakes.com website that violated U.S. law or was connected to interference in the U.S. elections.

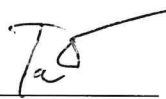
14. The seizure of the waronfakes.com domain is causing irreparable harm to the site, causing subscribers to lose interest and the entire project is suffering as a result, as further set forth in the declaration of Timofey V.

15. I have now read the redacted Seizure Affidavit of the FBI agent in this case, dated September 4, 2024. The Affidavit draws false conclusions about Timofey V, Dialog and myself

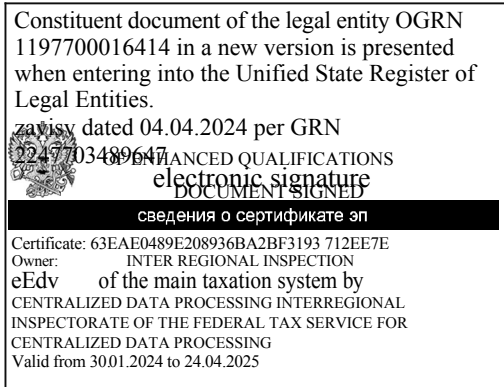
based on pure assumptions without evidence or justification. The information contained in the affidavit does not reflect reality and amounts to pure speculation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Moscow, Russia  
December 23, 2024

  
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Vladimir Tabak

# **EXHIBIT A**



Annex to the Order of the Department  
of Information Technologies of the City  
of Moscow

OT 1 апреля 2024.  
№ 64-16-130/24

BYLAWS  
autonomous non-profit organization for the development of digital  
projects in the field of public relations  
Dialogue (new edition)

г. Moscow  
2024



## 1. General Provisions

1.1. Autonomous non-profit organization for the development of digital projects in the field of public relations and communications "Dialogue" (hereinafter referred to as the Organization) is a non-profit organization established in the form of an autonomous non-profit organization on the basis of property contributions of its founder to achieve the goals stipulated by these Articles of Association (hereinafter referred to as the Charter).

1.2. The organization was established by incorporation in accordance with the Moscow City Government Order No. 628-RP dated November 8, 2019

"On the Establishment of the Autonomous Nonprofit Organization for the Development of Digital Projects in the Sphere of Public Relations and Communications " Dialogue" and operates in accordance with the Constitution of the Russian Federation, the Civil Code of the Russian Federation, Federal Law No. 7-FZ "On Nonprofit Organizations" dated January 12, 1996 (hereinafter - the Law "On Nonprofit Organizations"), the legislation of the Russian Federation and these Articles of Association.

1.3. Full official name of the Organization in Russian: Autonomous non-profit organization for the development of digital projects in the sphere of public relations and communications "Dialogue".

Abbreviated name of the Organization in Russian: Autonomous Non-Profit Organization "Dialogue".

Full name in English language:

autonomous nonprofit organization "Dialog".

Abbreviated name name Organization in

English in English: ANO "Dialog".

1.4. Location of the Organization: Russian Federation, Moscow.

The address of the Organization shall be indicated in the Unified State Register of Legal Entities.

1.5. The Organization has the right to open settlement, currency and other bank accounts in the Russian Federation and abroad in accordance with the established procedure.

1.6. An organization shall be considered established as a legal entity from the moment of its state registration in accordance with the procedure established by federal laws.

1.7. The organization shall be established without a term limit.

1.8. The Organization may be a plaintiff and defendant in courts of general jurisdiction, arbitration and arbitration courts, acquire and exercise property and non-property rights in its own name in accordance with the objectives of the Organization's activities, as provided for by the Charter of the Organization, and bear responsibilities related to such activities.

1.9. The Organization has a round seal with the full name of the Organization in Russian, stamps and letterheads with its name.

1.10. The requirements of the Charter of the Organization shall be binding on all

management bodies of the Organization and its founder.

1.11. The organization is not liable for the obligations of its founder.

1.12. The Organization is liable for its obligations with its property, which under the legislation of the Russian Federation may be foreclosed.

## **2. Founders of the Organization**

2.1. The founder of the Organization is the subject of the Russian Federation - the city of Moscow. The Moscow City Government represented by the Department of Information Technologies of the City of Moscow shall exercise the powers of the sole founder on behalf of the City of Moscow in accordance with the Moscow City Government Order No. 628-RP dated November 8, 2019 "On the Establishment of the Autonomous Non-Profit Organization for the Development of Digital Projects in the Sphere of Public Relations and Communications "Dialogue".

2.2. When exercising the powers of the management body - the sole founder, the Department of Information Technologies of the City of Moscow shall make decisions, which shall be deemed to be in-person and unanimous, by issuing the relevant orders.

2.3. The Sole Founder of the Organization shall supervise the activities of the Organization in the manner prescribed by the legislation of the Russian Federation and the present Charter by:

- request and analysis of documents and information related to the Organization's activities;
- conducting audits of the financial and economic activities of the Organization.

## **3. Aims and activities of the Organization**

3.1. The purpose of the Organization is to provide public relations and communications services.

3.2. The subject matter of the Organization's activities shall be:

- development digital projects в sphere public digital projects in the field of public relations and communications;
- Public Opinion Research;
- formation of an effective system of communications in the information and telecommunication network of the Internet.

3.3. The organization may carry out the following activities:

- creation и refinement digital projects в public relations and communications;
- creation software solutions for optimization и to optimize and improve the efficiency of work in the field of public relations and technology;
- study, generalization and dissemination of experience in the study of public opinion using digital technologies;
- organizing and holding interregional events devoted to the issues of development digital projects в sphere public relations public relations

and communications;

- Informing the public about the opportunities of digital projects in the field of public relations and communications by placing information in the mass media, information and telecommunication network Internet and by other means;
- provision of consulting and information services;
- organizing meetings and online conferences with leading experts - creators of digital projects in sociology, public relations and communications;
- dissemination of best practices in the implementation of digital projects in the field of public relations and communications;
- formation of a knowledge base based on the results of public opinion research;
- formation of databases on the results of sociology;
- collecting, processing and analyzing sociological information;
- Developing a communication strategy;
- Using sociological knowledge to solve important practical problems of society;
- development of educational programs.

3.4. The Organization may carry out entrepreneurial and other income-generating activities only insofar as such activities serve to achieve the purposes for which the Organization was established and correspond to the said purposes, provided that such activities are specified in its constituent documents. Such activities for the Organization are

NAMES:

- provision of services, performance of work, production and sale of goods on a paid basis to achieve the objectives of the Organization's establishment;
- leasing (subleasing) of movable and immovable property, if it corresponds to the purposes of establishment and the subject of the Organization's activities.

3.5. The Organization may establish a business company for entrepreneurial activities or participate in such a company within the limits established by the legislation of the Russian Federation.

3.6. In order to achieve its purpose, the Organization may establish other non-profit organizations and enter into associations and unions.

3.7. If any activity specified in the Charter requires a license or other special permit for the right to carry out a specific type of activity, the Organization may not carry out such activity without a license or other special permit.

3.8. Securing the Organization's rights to intellectual property objects acquired or created in the course of statutory and business activities, as well as their disposal are carried out in accordance with federal laws and other regulatory legal acts of the Russian Federation.

#### **4. Governing bodies of the Organization and control of its activities**

- 4.1. Sole Founder.
- 4.2. Board of Supervisors.
- 4.3. Executive Committee.
- 4.4. General Manager.

#### **5. Sole founder**

5.1. The governing body of the Organization is the sole founder.

5.2. The exclusive competence of the sole founder includes the following issues:

5.2.1. Decision-making on the inclusion of new persons in the founders of the Organization in accordance with the current legislation;

5.2.2. formation supervisory supervisory board,  
approval composition of the Supervisory Board and early  
termination of powers of its members;

5.2.3. Education executive committee, approval  
composition of the executive committee and early termination of powers  
of its members;

5.2.4. Appointment of the sole executive body of the Organization - General Director, and early termination of his powers;

5.2.5. Preliminary approval of major transactions - transactions or several interrelated transactions related to the disposal of funds, alienation of other property, as well as the transfer of such property for use or as a pledge, if the price of such transaction or the value of the alienated or transferred property exceeds 10 percent of the book value of the Organization's assets determined according to the accounting statements as of the last reporting date;

5.2.6. Other issues referred to the competence of the sole founder by the Civil Code of the Russian Federation, the Law "On Non-Profit Organizations", other regulatory legal acts and this Charter.

5.3. Issues referred by this Charter to the competence of the Sole Founder may not be referred to the competence of the General Director and other management bodies.

#### **6. Supervisory Board**

6.1. The permanent collegial supreme governing body of the Organization is the Supervisory Board. The Supervisory Board is appointed by the sole founder for a period of 3 (three) years and consists of at least three members. The Supervisory Board acts on a voluntary basis.

6.2. The main function of the Supervisory Board is to ensure that the Organization complies with the purposes for which it was established.

6.3. The competence of the Supervisory Board shall include:

6.3.1. Adoption of the Organization's strategy;

6.3.2. Determination of priority directions of the Organization's activity, principles of formation and use of its property;

6.3.3. Amendment of the Articles of Association of the Organization;

6.3.4. Determining the procedure for admission to the founders of the Organization and exclusion from its founders, except in cases where such procedure is determined by federal laws;

6.3.5. Formation of organs of the Organization and early termination

**THEIR POWERS;**

6.3.6. Adoption of decisions on the establishment by the Organization of other legal entities, on the Organization's participation in other legal entities, on the establishment of branches and on the opening of representative offices of the Organization;

6.3.7. Adoption of decisions on reorganization and liquidation of the Organization, appointment of a liquidation commission (liquidator) and approval of the liquidation balance sheet;

6.3.8. Approval of the audit organization or individual auditor;

6.3.9. To assist in the implementation of the Organization's goals, object and activities;

6.3.10. Approval of the appointment of the CEO;

6.3.11. Representation of the organization, including at public events, in the media, as well as in interaction with other organizations (unions), representatives of the public;

6.3.12. Approval of the rules of procedure of the supervisory board;

6.3.13. Other issues referred to the competence of the Supervisory Board by the Civil Code of the Russian Federation, the Law "On Non-Profit Organizations", other regulatory legal acts and these Articles of Association.

6.4. The Supervisory Board is headed by the Chairman, who is appointed by the sole founder from among its members for the term of office of the Supervisory Board. The Chairman of the Supervisory Board convenes meetings of the Supervisory Board, presides at meetings, signs minutes of meetings, represents the Supervisory Board in relation to other bodies of the Organization and other persons.

6.5. The rights and duties of the chairman of the supervisory board in his absence shall be exercised by the deputy chairman of the supervisory board.

6.6. Meetings of the supervisory board may be held with the frequency necessary for the conduct of business, but at least once a year. The place of meetings shall be the city of Moscow or another place accessible to the members of the supervisory board. Resolutions of the supervisory board shall be adopted by a majority vote of the members participating in the meeting.

6.7. Each member of the Supervisory Board shall be notified of the date, time and place of the meeting, as well as of the issues to be considered no later than three (3) working days prior to the date of the meeting.

6.8. Decisions adopted at the meeting of the Supervisory Board shall be formalized by minutes, which shall be drawn up not later than 3 (three) working days after the meeting and signed by the chairperson of the meeting and the secretary of the meeting.

## **7. Executive Committee**

7.1. The permanent collegial executive body of the Organization is the Executive Committee. The Executive Committee is appointed by the sole founder for a period of 3 (three) years and consists of at least three members. The Executive Committee acts on a voluntary basis.

7.2. The jurisdiction of the executive committee shall include:

7.2.1. Approval of the Organization's financial plan, the procedure for its formation, execution and amendments;

7.2.2. Approval of the annual report and accounting (financial) statements of the Organization;

7.2.3. Approval of transactions in accordance with Article 27 of the Law "On Non-Profit Organizations."

7.2.4. Approval of transactions related to the acquisition by the Organization of goods, works and (or) services, as well as other expenses referred to its competence, the value of which exceeds 1,000,000 (one million) rubles or the equivalent of such amount for one transaction or several interrelated transactions, except for transactions provided for by cl.

4.1 of Article 10 of the Federal Law "On Non-Profit Organizations";

7.2.5. Approval of transactions related to the alienation or possibility of alienation by the Organization directly or indirectly of property the value of which exceeds 1,000,000 (one million) rubles or the equivalent of such amount in one transaction or several interrelated transactions, except for transactions provided for by paragraph 4.1 of Article 10 of the Federal Law "On Non-Profit Organizations."

7.2.6. Adoption of decisions on acquisition, encumbrance or alienation of immovable property, except for transactions provided for by paragraph 4.1 of Article 10 of the Federal Law "On Non-Profit Organizations";

7.2.7. Making decisions on the conclusion of pledge agreements or other encumbrance of any property of the Organization, provision of sureties or guarantees, except for transactions provided for by paragraph 4.1 of Article 10 of the Federal Law "On Non-Profit Organizations";

7.2.8. Approval of material terms of the employment contract with the General Director, establishment of the amount of remuneration, additional remuneration, compensations and (or) benefits to the General Director, in addition to those stipulated by his employment contract, internal documents of the Organization and (or) the legislation of the Russian Federation;

7.2.9. Approval of appointment of deputies to the position of the General Director



the director and the chief accountant;

7.2.10. Establishing the term for which deputy general directors and chief accountant are appointed;

7.2.11. Approval of the maximum number of the Organization's employees and payroll for a period of 1 (one) year;

7.2.12. Approval of regulations on procurement of goods (works, services); on contractual work; on remuneration and bonuses; on social security; on the internal control system; on financial planning and budgeting; on the procedure for selecting an organization when depositing funds; on anti-corruption policy; on confidential information;

7.2.13. Approval of the rules of procedure of the executive committee;

7.2.14. Approval of standard forms of contracts;

7.2.15. Approval of information security policy;

7.2.16. Approval of the Code of Corporate Conduct;

7.2.17. Determination of the list of documents regulating the internal activities of the Organization (internal documents of the Organization), the approval of which falls within the competence of the Executive Committee;

7.2.18. Approval of the maximum amount of remuneration for the services of the audit organization or individual auditor of the Organization;

7.2.19. Other issues referred to the competence of the Executive Committee by the Civil Code of the Russian Federation, the Law "On Non-Profit Organizations", other regulatory legal acts and this Charter.

7.3. The issues specified in clause 7.2 of this Charter shall fall within the exclusive competence of the Executive Committee.

7.4. Meetings of the executive committee shall be held at the frequency necessary to conduct business, but at least once a year. The venue of the meetings shall be the city of Moscow or another place accessible to the members of the executive committee. A meeting of the executive committee shall be held for the purpose of discussing agenda items and making decisions on issues put to a vote in the form of joint presence of members or in the form of absentee voting.

7.5. A meeting of the executive committee shall be deemed competent if more than half of the total number of members of the executive committee or their authorized representatives are present.

7.6. The Executive Committee shall take decisions by a majority vote of the Executive Committee members or their authorized representatives present at the meeting. Each member of the executive committee or his/her authorized representative shall have one vote.

7.7. Decisions of the Executive Committee on the matter specified in clause 7.2.3. hereof shall be made by a majority vote of the members of the Executive Committee who are not interested in the transaction, as defined in Article 27 of the Law "On Non-Profit Organizations".

7.8. Each member of the executive committee shall be notified

of the date, time and place of the meeting, as well as of the issues to be considered no later than three (3) working days prior to the date of the meeting.

7.9. Decisions made at a meeting of the Executive Committee shall be formalized by minutes, which shall be drawn up no later than three (3) working days after the meeting and signed by the chairperson of the meeting and the secretary of the meeting.

7.10. The Executive Committee is headed by the Chairman, who is appointed by the sole founder from among its members for the term of office of the Executive Committee. The Chairman of the Executive Committee convenes meetings of the Executive Committee, presides at meetings, signs minutes of meetings, represents the Executive Committee in relations with other bodies of the Organization and other persons.

7.11. The rights and duties of the Chairman of the Executive Committee shall be exercised by the Deputy Chairman of the Executive Committee in his absence.

## **8. Director General**

8.1. The sole executive body of the Organization is the General Director, who is appointed by the sole founder for a period of up to 4 (four) years.

8.2. The General Director manages the current activities of the Organization, is accountable to the sole founder, the Supervisory Board, the Executive Committee and is personally responsible for the activities of the Organization.

8.3. General Manager:

8.3.1. Without power of attorney represents the interests of the Organization in relations with Russian and foreign legal entities, state bodies and local authorities;

8.3.2. Concludes contracts and performs other transactions on behalf of the Organization within the limits of its authority, ensures the Organization's fulfillment of obligations thereunder;

8.3.3. Opens settlement and current accounts in rubles and foreign currency in credit organizations in the Russian Federation and abroad;

8.3.4. Issue orders, instructions and other acts binding on the employees of the Organization;

8.3.5. Issuing powers of attorney, including those with the right of power of attorney;

8.3.6. Approves the staffing table and organizational structure of the Organization;

8.3.7. Approves job descriptions, incentive and other payments, working hours, and resolves issues of social security and social insurance of the Organization's employees;

8.3.8. Hires and dismisses employees of the Organization, applies disciplinary measures and rewards to them;



8.3.9. Approves internal documents of the Organization related to the implementation of the powers assigned by this Charter to the competence of the General Director;

8.3.10. Exercises other powers not attributed by this Charter and (or) the legislation of the Russian Federation to the competence of the sole founder, the Supervisory Board and the Executive Committee.

8.4. The employment contract with the General Director on behalf of the Organization is concluded and terminated by the Chairman of the Executive Committee or a person authorized by the Executive Committee. Conclusion or termination of the labor contract is carried out on the basis of the decision of the sole founder and the presence of approval by the Supervisory Board.

## **9. Property and financial and economic activities of the Organization**

9.1. The Organization may own, lease, as well as have other rights to land plots, buildings, premises, structures, equipment, tangible assets, monetary funds in rubles and foreign currency, securities and other property, obtain on a legal basis the results of intellectual activity and means of individualization, including exclusive and non-exclusive rights to them.

9.2. The sources of formation of the property of the Organization are:

9.2.1. Regular and non-recurring income from the sole founder;

9.2.2. Subsidies (grants) provided by state bodies in accordance with the legislation of the Russian Federation and regulatory legal acts of the city of Moscow;

9.2.3. Voluntary property contributions and donations;

9.2.4. Income from entrepreneurial and other income-generating activities;

9.2.5. Other receipts not prohibited by the legislation of the Russian Federation.

9.3. All property of the Organization, income from entrepreneurial activities are the property of the Organization and cannot be redistributed by the sole founder. The Organization owns, uses and disposes of its property in accordance with its purpose and only for the fulfillment of its statutory objectives.

9.4. The Sole Founder does not have the right of ownership of the Organization's property, including that part of the property, which was formed at the expense of receipts, contributions and donations from the Sole Founder.

9.5. The Organization ensures the protection of information constituting commercial, official and other secrets protected by law in accordance with the established procedure.

## **10. Accounting and Reporting of the Organization**

10.1. The Organization ensures accounting, preparation and submission of reports in accordance with the procedure established by the legislation of the Russian Federation, as well as agreements and contracts concluded by the Organization. The fiscal year coincides with the calendar year.

10.2. The Organization provides information on its activities to state statistics bodies, tax authorities and other persons in accordance with the legislation of the Russian Federation and this Charter.

10.3. The Organization publishes an annual report on its activities on its official website in the information and telecommunications network Internet, as well as other sites in accordance with the requirements of the legislation of the Russian Federation.

## **11. Reorganization and liquidation of the Organization**

11.1. The Organization may be reorganized or liquidated on the basis and in accordance with the procedure provided for by the Civil Code of the Russian Federation, the Law "On Non-Profit Organizations" and other federal laws.

11.2. In the event of liquidation of the Organization, the property remaining after satisfaction of claims, unless otherwise established by the current legislation, shall be directed in accordance with the Charter of the Organization for the purposes in the interests of which it was established, and (or) for charitable purposes. If it is not possible to use the property of the Organization in accordance with the Charter, it shall be transferred to the State.

11.3. Liquidation shall be deemed completed and the Organization shall be deemed to have ceased to exist after the entry on liquidation is made in the Unified State Register of Legal Entities.

## **12. Introduction of amendments and additions to the Charter**

12.1. State registration of the Charter of the Organization with amendments or in a new version shall be carried out in accordance with the procedure established by federal laws.

12.2. The Charter of the Organization, as amended or in a new version, shall come into force from the moment of state registration.